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October 4, 2000

OFFICE
DEFECTS INVESTIGATION

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh St. S.W.
Washington, D.C. 20590

Reference: Campaign number 00E-051

To Whom it May Concern:

Responding to your request for additional information for the subject campaign:

1. Summary of events leading to the discovery of the defect.

Dexter Axle Company manufactures running gear and associated components for trailer manufacturers. Trailer manufacturers will often procure components such as wheels from other suppliers. Dexter's position in these cases is that the trailer manufacturer is responsible for ensuring that components produced by others will interface properly with our products.

In February of 2000, Dexter began shipping a new version of our 6 bolt hub/ brake drum which had undergone some weight reduction changes. The change involved the addition of a groove in the surface that provides the interface to the wheel. The design was tested to ensure compatibility with steel wheels produced by Dexter Axle. We did not foresee that other manufacturers wheels would be incompatible with this design. There are no industry standards that we are aware of that would have prevented this mis-match.

In early August of 2000, we were notified by one of the trailer manufacturers that they had a retail customer complaining of wheel loosening. We contacted the retail customer to get detailed information and were told that the wheels on his trailer were aluminum, made by American Racing Equipment, model AR-62. He reported that the mounting surface of this wheel measured 6.5 inch diameter. The normal dimension for this particular 6 on 5.5" bolt pattern would be 7.3 inches

We then contacted the manufacturer to get a sample so that we could perform an analysis of the problem. We discovered that when this wheel is mated to the Dexter hub, its smaller than normal mounting surface does not provide sufficient contact area, the result of which will lead to fasteners loosening. Even though Dexter Axle did not manufacture the wheel and we consider the redesigned hub/drum to be appropriately matched to our wheels, we elected to perform the recall. We did this based on our failure to notify our customers of the change in our hub/drum.

We next contacted Tredit Tire and Axle Company who was the exclusive distributor of this American Racing Equipment aluminum wheel. We obtained from them, a list

of customers and the quantity of these wheels that each received during the time period beginning in February 2000 through August 2000. We then sent an advisory letter to each of these customers cautioning them to check vehicles in their inventory and hold them until a remedy could be performed.

In the meantime, we engineered the remedy that would be used. On August 28, 2000, I wrote the notification letter that would be sent to your office, accompanied by the exemplar letters to be sent to dealers and retail customers.

I was contacted by your office on September 11, 2000 by Ms Kelly Schuler. Ms Schuler asked me to provide information, namely the population of axles to be recalled and a description of the remedy to be employed. This information was FAXed to her on September 11, 2000 with a follow up note on the same date correcting her acknowledgement. I had reported the population as 6432 wheels, not axles.

Each axle uses two wheels, therefore the number of axles to be recalled is 3216 units, two wheels each. Please amend your records to reflect the true population.

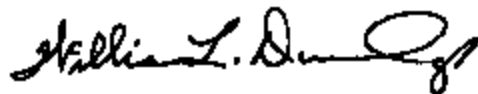
2. Illustrations of the recalled component

The attached photograph entitled 008-201-00 Picture 1 represents the subject hub/drum. The arrows point out the groove area that does not properly support undersized wheel mount faces such as the American Racing Equipment, Inc. wheel which has led to this recall.

3. Supplier name, part number and size

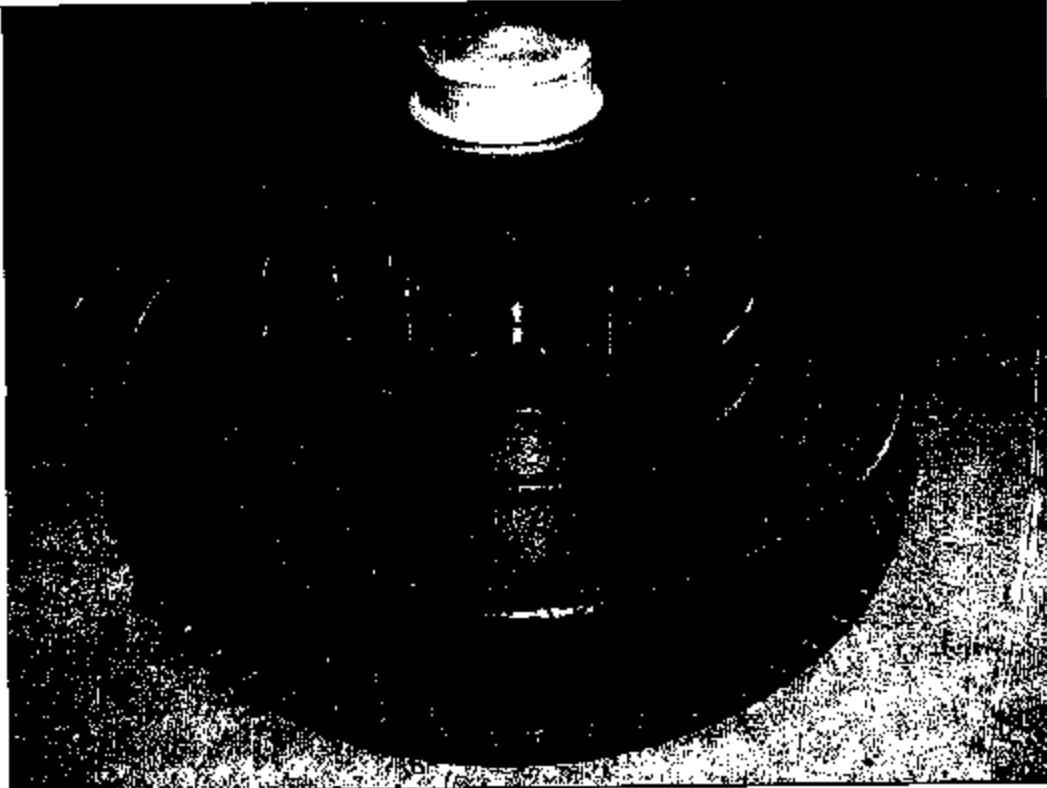
Dexter Axle Company is the supplier of the #008-201-00 hub/drum which is a 12" x 2" gray iron casting used on 6000 pound capacity trailer axles.

Sincerely,

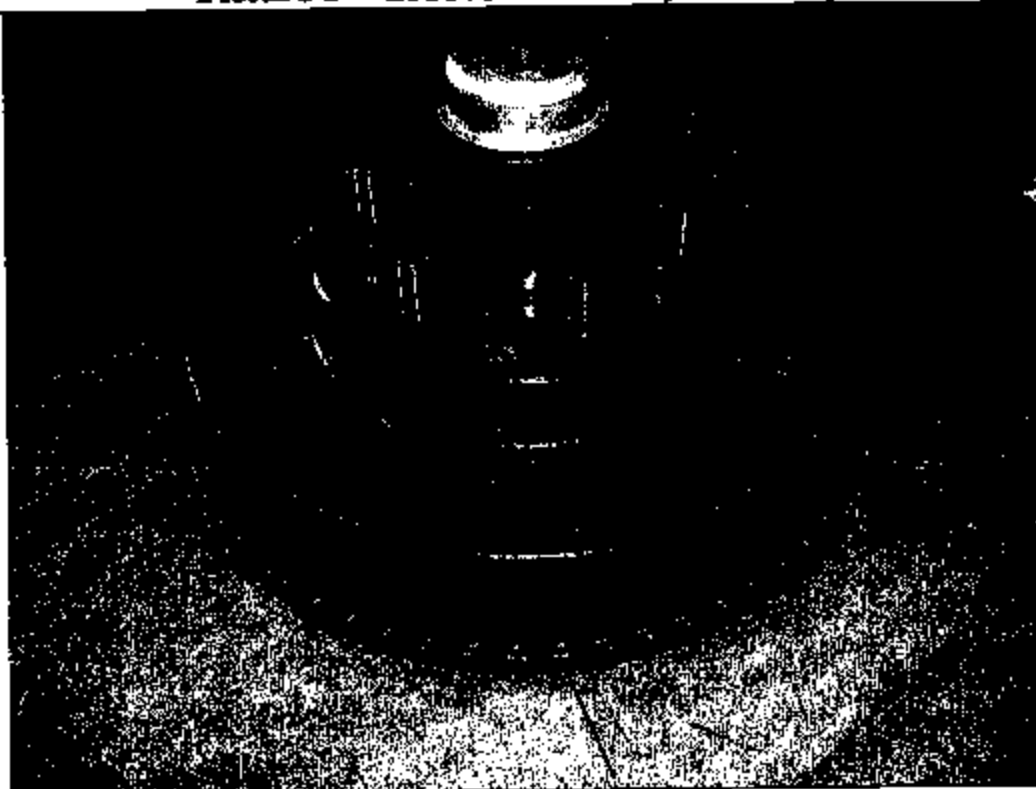


William L. Dunlap
Director of Engineering
Service and Warranty

008-201-00



Picture 1 – Groove – 1" Wide, 3/16" Deep



Picture 2 – No Grooves